

RECEIVED

OCT 21 2016

SUPERFUND DIVISION



Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

www.dnr.mo.gov

October 14, 2016

CERTIFIED MAIL – 7014 2120 0002 3004 7577
RETURN RECEIPT REQUESTED

Mr. Raymond F. Williams
U.S. Technology Corporation
4200 Munson St. NW
Canton, OH 44718

RECEIVED
OCT 21 2016
AWMD/WEMM

Dear Mr. Williams:

I am responding on behalf of the Missouri Department of Natural Resources, Hazardous Waste Program to your letter dated August 19, 2016, (copy enclosed). This letter requested I evaluate the process of spent blasting media (SBM) generated by U.S. Technology Corporation (UST) being incorporated into concrete block manufactured by Midwest Block Co. (Midwest) and determine if the SBM is exempted from hazardous waste management laws and regulations.

Based on the information provided, I determined this use does not meet the legitimacy requirements for the reuse/recycling of hazardous wastes. Therefore, this process is not exempt from hazardous waste management laws and regulations. The SBM meeting the definition of a listed or characteristic hazardous waste must be managed as required by hazardous waste management laws and regulations.

If SBM meets the definition of a listed or characteristic hazardous waste and is used in the process you describe, UST and Midwest may be cited for violations of hazardous waste management laws and regulations.

RCRA



567255



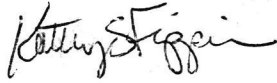
Recycled Paper

Mr. Raymond F. Williams
Page Two

If you have any questions concerning this letter, please contact me at (573) 751-3465, anthony.pierce@dnr.mo.gov or by mail at the Missouri Department of Natural Resources, Hazardous Waste Program, Compliance/Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102-0176.

Sincerely,

HAZARDOUS WASTE PROGRAM



Kathy S. Flippin
Chief
Compliance and Enforcement Section

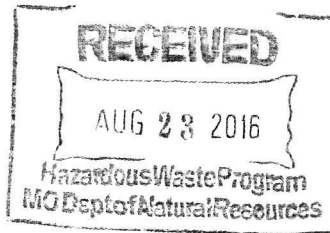
KSF:tpj

Enclosures

c: Mr. Darryl Winegar, Midwest Block
Environmental Protection Agency Region VII
Environmental Protection Agency Region VI
Environmental Protection Agency Region V



4200 Munson ST NW, Canton, OH 44718 (234) 458-8009 FAX (234) 458-8010



August 19, 2016

Mr. Anthony Pierce
Environmental Specialist
Missouri Department of Natural Resources
Hazardous Waste Program Compliance
PO Box 176
Jefferson City, MO 65107

Dear Mr. Pierce,

U.S. Technology is seeking renewed confirmation that spent blast media (SBM), used as a substitute ingredient in the manufacture of concrete block at Midwest Block Co. is exempt from regulation as a hazardous waste.

In support of this request, we are enclosing information on:

- A. SBM equivalency to standard ingredient
- B. Benefit of SBM in block
- C. U.S. Patents on SBM in block
- D. Sylvia Lowrance analysis of topics
- E. Missouri and other states letters
- F. UST/Midwest Supply use of SBM
- G. Applied to land 40CFR266
- H. Sample Draft letter

Over 25 million concrete blocks have been made and sold using SBM as an ingredient at various companies and locations.

At the point where Midwest stopped taking material, they were using one load a week i.e.: $40,000 \times 50 \text{ wh} = 2,000,000 \text{ \#/year}$.

SBM in block makes them denser, smoother, more water resistant, and lighter